

Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

SEATTLE METROPOLITANS HOCKEY  
LLC, a Washington limited liability company,

### Plaintiff / Counterclaim Defendant,

V.

SEATTLE HOCKEY PARTNERS LLC, a  
Delaware limited liability company,

### Defendant / Counterclaim Plaintiff:

Civil Action No. 23-cv-1989-JLR

STIPULATED MOTION AND  
[PROPOSED] ORDER TO EXTEND  
TRIAL AND RELATED DATES

**NOTE ON MOTION CALENDAR:  
November 15, 2024**

## STIPULATION

Pursuant to the Court's Order (Dkt. 32) regarding modified expert witness disclosure, and further in an effort to manage a large number of fact and expert depositions that otherwise would need to occur during the holiday season, the parties jointly stipulate and respectfully move the Court for an order extending trial and related dates by approximately one month. The parties believe that good cause is shown for this extension for at least the following reasons:

- Additional time is required for damages expert witness disclosure, third-party discovery, as well as scheduling related expert, party and third-party depositions.
- As contemplated in the parties' Joint Status Report (Dkt. 17), the parties expect to have substantially all written discovery complete by December 2025, and have committed

STIPULATED MOTION AND [PROPOSED] ORDER FOR  
EXTENSION - 1

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1 to mediation in January 2025, after the holidays and before substantial deposition  
 2 discovery.

3 The parties respectfully submit that the discovery issues and commitment to early mediation  
 4 provide good cause for the requested extension. The proposed new schedule is as follows:

Action	Current Date	Proposed Date
5 DAY JURY TRIAL	May 19, 2025	Jun 23, 2025
Deadline to conduct mediation	—	Jan 17, 2025
Disclosure of damages expert testimony under FRCP 26(a)(2)	Nov 5, 2024	Nov 22, 2024 <sup>1</sup>
Disclosure of rebuttal survey expert testimony under FRCP 26(a)(2)		Dec 5, 2024
Disclosure of rebuttal damages expert testimony under FRCP 26(a)(2)		Dec 23, 2024 <sup>2</sup>
All motions related to discovery must be filed by LCR 7(d)	Dec 5, 2024	Jan 13, 2025
Discovery completed by	Jan 6, 2025	Feb 17, 2025
All dispositive motions and motions challenging experts must be filed by LCR 7(d)	Feb 3, 2025	Mar 10, 2025
Settlement conference held no later than	Mar 20, 2025	Apr 25, 2025
Motions <i>in limine</i> should be filed pursuant to Local Rule CR 7(d)(4) by	Apr 7, 2025	May 7, 2025
Agreed pretrial order filed with the Court by	Apr 28, 2025	May 26, 2025
Deposition designations must be submitted in hardcopy to the court (not filed on CM/ECF) by LCR 32(e)	Apr 30, 2025	May 28, 2025
Pretrial conference will be held at 02:00 PM on	May 5, 2025	Jun 9, 2025
Trial briefs, proposed <i>voir dire</i> , jury instructions by Motions raised in trial briefs will not be considered	May 12, 2025	Jun 16, 2025

20 The stipulated extension is not submitted for the purposes of delay, but rather due to  
 21 litigation and party logistics, and is in the interests of justice and fairness. The parties respectfully  
 22 request that the Court agree to the stipulated extension of time and issue the proposed order  
 23 submitted herewith.

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25 <sup>1</sup> Or seven calendar days after receipt of Kraken's complete ordered discovery responses, whichever is later.  
 26 <sup>2</sup> Assuming the opening damages expert report is served Nov 22, 2024. Otherwise, within 30 days of service.

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RESPECTFULLY SUBMITTED November 15, 2024.

s/ David A. Lowe, WSBA No. 24453  
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*Attorneys for Defendant*

I certify that this memorandum contains  
\_\_\_\_\_ words, in compliance with the Local  
Civil Rules.

### [PROPOSED] ORDER

Pursuant to the Stipulation of the parties, IT IS SO ORDERED.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

\_\_\_\_\_  
United States District Judge

STIPULATED MOTION AND [PROPOSED] ORDER FOR  
EXTENSION - 3

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